

Issuance Transmittal Sheet

George C. Marshall Space Flight Center
Marshall Space Flight Center, Alabama 35812

Issuance Number: MMI 8800.6	Date: August 23, 1995
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Material Transmitted:

1. Marshall Management Instruction, MMI 8800.6, subject: "MSFC Policy on Class I Ozone-Depleting Chemicals (ODCs) Control and Usage"
2. This instruction is being established to define MSFC's policy on ozone-depleting chemical control and usage.

Filing Instructions:

File in a standard 3-ring binder in numerical sequence without regard to the alphabetical prefix which identifies the type of issuance.

Management Instruction

George C. Marshall Space Flight Center
Marshall Space Flight Center, Alabama 35812

Originating Organization: EH01	Effective Date: August 23, 1995	MMI 8800.6
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Subject: MSFC Policy on Class 1 Ozone-Depleting Chemicals (ODCs) Control and Usage

1. PURPOSE

This Instruction defines MSFC's policy on Ozone-Depleting Chemical (ODC) control and usage in accordance with the Montreal Protocol and Clean Air Amendments of 1990 (CAAA) - Title VI. These regulations mandate the U.S. production phase-out of Class 1 ODCs effective January 1, 1996. Attachment A identifies all Class 1 ODCs.

2. APPLICABILITY

This Instruction is applicable to continued procurement of Class 1 ODCs for all MSFC operations and all on-site projects/programs managed by MSFC.

3. AUTHORITY

The Environmental Protection Agency (EPA), through the Federal Register, Vol. 58, No. 51, issued March 18, 1993, imposed the accelerated phase-out schedule of Class 1 ODCs as per the Copenhagen Amendments of 1992.

4. POLICY

It is the MSFC policy that:

- a. All Class 1 ODCs shall be procured solely through MSFC's procurement system and classified as program stock. No direct customer purchases allowed.
- b. It shall be the responsibility of the Activity Supply Office to verify all personnel withdrawing Class 1 ODCs from the MSFC storage are authorized to do so. The MSFC Activity Supply Office shall also identify the withdrawn material and record the quantity issued.

- c. Withdrawal privileges shall be restricted to no more than two Appropriately Designated Individuals (ADIs) per laboratory/office.
- d. The utilization of Class 1 ODCs shall be permitted only for cleaning and cleanliness verification and for other critical applications where alternates have not been qualified. Currently, critical applications include but are not limited to: bonding or bond surface activation, precision cleaning per MSFC-SPEC-164, optical cleaning, and gyroscope cleaning.

For information only: Trichloroethylene (TCE) may be used for closed loop field cleaning until alternatives are identified.

- e. Existing closed loop systems, for example, refrigeration systems, using Class 1 ODCs may continue to receive routine maintenance but should be considered for replacement at the earliest opportunity.
- f. For the applications which permit the usage of Class 1 ODCs, a recycling program must be developed and implemented to support the requirements of paragraph 7.0.
- g. For applications other than those characterized in paragraph 4.d, Class 1 ODC alternatives shall be used.
- h. The development of Hydrochlorofluorocarbon (HCFC) or HCFC blends for alternative uses defined in paragraph 4.d is encouraged.

5. BACKGROUND

- a. Actions and decisions required to achieve effective levels of Class 1 ODC control and reduction in usage cut across, and extend through, every facet of MSFC activities.
- b. Effective enforcement of this Class 1 ODC control and usage policy is required to minimize impact to MSFC operations.

6. RESPONSIBILITIES

- a. The NASA Operational Environment Team (NOET) through the Marshall Replacement Technology Team (MRT²) ODC Leader will:

- (1) Ensure that a recordkeeping mechanism is in place for Class 1 ODC consumption tracking.
 - (2) Ensure that the restricted access to Class 1 ODCs is maintained.
 - (3) Review current Class 1 ODC usage practices, and recommend disposition of requests for continued usage. Unresolved issues shall be resolved by Center-level management.
 - (4) Provide guidance and direction for the implementation of alternative materials in which Class 1 ODC usage is no longer permitted.
- b. The Appropriately Designated Individuals (ADIs) will:
- (1) Regulate Class 1 ODC consumption throughout their respective laboratory/office.
 - (2) Ensure that Class 1 ODC users within their laboratory/office receive adequate training to properly handle Class 1 ODCs.
 - (3) Receive Class 1 ODC handling training to be knowledgeable of appropriate procedures and current requirements.
 - (4) Ensure recaptured Class 1 ODCs, within their respective laboratory/office, are properly handled and returned to the Environmental Engineering and Management Office's hazardous waste management contractor for proper disposal or recycling.
- c. The Environmental Engineering and Management Office (EE&MO) will:
- (1) Assure compliance with current handling and usage criteria for Class 1 ODCs and alternative materials such as TCE.
 - (2) Assure training in related areas.
 - (3) Incorporate Class 1 ODC usage and recovery records into Toxic Release Inventory reports to EPA.
 - (4) Maintain records and traceability of stockpiled Class 1 ODCs.

- (5) Maintain Facilities Data/Records regarding chillers, air conditioning units, etc.
- d. The MSFC employees/On-site contractors will:
 - (1) Comply with MSFC Policy on Class 1 Ozone-Depleting Chemical (ODCs) Control and Usage standards, guidelines, regulations, and other actions designed to conserve the environment and protect the earth's ozone layer.
 - (2) Employees involved in Class 1 ODC usage shall be trained to effectively contain and recapture Class 1 ODCs before access is authorized.

7. RECYCLING POLICY

- a. It is the responsibility of the using laboratory/office ADIs to assure the return of recaptured Class 1 ODCs to the Environmental Engineering and Management Office.
- b. The MSFC Property Management Division must report the issue of the Class 1 ODCs traceable to laboratory/office to the NOET ODC leader and the EE&MO on a quarterly basis. The Environmental Engineering and Management Office must maintain a record of recycling.
- c. The laboratory/office ADI shall assure fluids severely contaminated with Class 1 ODCs, cleaning media (rags, etc.) contaminated with Class 1 ODCs, and Class 1 ODCs severely contaminated to the extent that recycling is impracticable shall continue to be processed as hazardous waste through the Environmental Engineering and Management Office's hazardous waste management contractor.

(Original signed by)

G. P. Bridwell
Director

Attachment:
Appendix/Class 1 ODCs

Distribution:
SDL-4

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MMI 8800.6
Attachment

Class 1 ODCs

Group I CFC-11
 CFC-12
 CFC-113
 CFC-114
 CFC-115

Group II Halon-1211
 Halon-1301
 Halon-2402

Group III CFC-13
 CFC-111
 CFC-112
 CFC-211
 CFC-212
 CFC-213
 CFC-214
 CFC-215
 CFC-216
 CFC-217

Group IV Carbon Tetrachloride

Group V 1,1,1-Trichloroethane